

GIBSON, DUNN & CRUTCHER LLP
JOEL S. SANDERS, SBN 107234
jsanders@gibsondunn.com
RACHEL S. BRASS, SBN 219301
rbrass@gibsondunn.com
AUSTIN SCHWING, SBN 211696
aschwing@gibsondunn.com
555 Mission Street, Suite 3000
San Francisco, CA 94105
Telephone: (415) 393-8200
Facsimile: (415) 986-5309

Attorneys for Defendants
CHUNGHWA PICTURE TUBES, LTD. and
CHUNGHWA PICTURE TUBES (MALAYSIA)
SDN. BHD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-CV-5944 SC
MDL No. 1917

This Document Relates To:

Best Buy Co. Inc. et al. v. Hitachi, Ltd. et al., No.
3:11-cv-05513-SC

*Sears, Roebuck and Co. et al. v. Chunghwa
Picture Tubes, Ltd. et al.*, No. 3:11-cv-05514-SC

*Target Corp. v. Chunghwa Picture Tubes, Ltd. et
al.*, No. 3:11-cv-05514-SC

*ViewSonic Corp. v. Chunghwa Picture Tubes,
Ltd. et al.*, No. 3:14-cv-02510-SC

**DECLARATION OF RACHEL S. BRASS
IN SUPPORT OF DEFENDANTS
CHUNGHWA PICTURE TUBES, LTD.
AND CHUNGHWA PICTURE TUBES
(MALAYSIA) SDN. BHD.'S NOTICE OF
LIMITATION OF DAMAGES PURSUANT
TO ANTITRUST CRIMINAL PENALTY
ENHANCEMENT AND REFORM ACT OF
2004**

1 I, Rachel S. Brass, hereby declare as follows:

2 1. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Chunghwa Picture Tubes, Ltd. ("CPT") and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.
4 ("CPTM") in the above-referenced action.

5 2. I submit this declaration in support of Defendants CPT and CPTM's Notice of
6 Limitation of Damages Pursuant to Antitrust Criminal Penalty Enhancement and Reform Act of
7 2004. Unless otherwise indicated, I have personal knowledge of the foregoing and could and would
8 testify to the same if called as a witness in this matter.

9 3. Attached as **Exhibit A** is a true and correct copy of the leniency agreement entered
10 into between Chunghwa Picture Tubes, Ltd. and its subsidiaries (including CPTM) and the Antitrust
11 Division of the U.S. Department of Justice.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Executed this 15th day of January 2015, at San Francisco, California.

14
15 By: /s/ Rachel S. Brass
16 Rachel S. Brass

17 101864531.1
18
19
20
21
22
23
24
25
26
27
28